

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

UGOCHUKWU GOODLUCK NWAUZOR,  
FERNANDO AGUIRRE-URBINA,  
individually and on behalf of all those  
similarly situated,

Plaintiffs/Counter-Defendants,

v.

THE GEO GROUP, INC.,

Defendant/Counter-Claimant.

Case No. 3:17-cv-05769-RJB

**DECLARATION OF COLIN L.  
BARNACLE IN SUPPORT OF  
DEFENDANT THE GEO GROUP, INC.'S  
OBJECTIONS TO PLAINTIFFS'  
PROPOSED AMENDED NOTICE PLAN**

1. I, Colin L. Barnacle, make the following statement under oath subject to the penalty of perjury pursuant to the laws of the United States and the State of Washington:

2. I am the attorney for The GEO Group, Inc. in the above-captioned matter. I am over the age of eighteen (18), and I am competent to testify in this matter.

3. On January 13, 2020, Plaintiffs' counsel sent me a proposed notice plan from class notice administrator, JND.

4. In that notice plan, JND relied upon "sources that provided information about detainees and illegal immigrants in general" to determine the appropriate scope of the notice plan. JND also relied upon information provided by Plaintiffs' counsel that the class list was comprised of individuals 95% of whom were from Mexico, El Salvador, Guatemala, and Honduras.

5. The notice plan proposed a social media campaign targeted at "Spanish Speaking Adults 18-55 . . . [g]eographically covering Mexico (heavy emphasis), El Salvador, Guatemala,

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and Honduras, and 10-mile radius of cities along U.S./Mexico border[.]”

6. The proposed notice plan did not include any publication notice in a print medium.

7. I have reviewed the actual class list using simple functions in Microsoft Excel, including pivot tables.

8. From my review, I have determined that just over half of the individuals listed have indicated an affiliation with addresses in Mexico, El Salvador, Honduras, and Guatemala.

9. My review also indicates that most individuals on the list provided both a United States address and a foreign address.

10. Additionally, I have reviewed the data from the Transactional Records Access Clearing House (“TRAC”), relied upon by Plaintiffs’ expert Christopher Strawn. True and correct copies of data from TRAC are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**.

11. The list of facilities where detainees are housed, and the number of individuals in each facility can be found below:

DENVER CONTRACT DETENTION FACILITY	1
ELOY FEDERAL CONTRACT FACILITY	1
FLORENCE STAGING FACILITY	4
IMMIGRATION CENTERS OF AMERICA	
FARMVILLE	1
JACKSON PARISH CORRECTIONAL CENTER	1
KANKAKEE COUNTY JAIL (JEROME COMBS DET CTR)	1
LASALLE CORR CTR OLLA	1
NORTHERN OREGON CORRECTIONAL FACILITY	10
OTAY MESA DETENTION CENTER (SAN DIEGO CDF)	4
OTERO COUNTY PROCESSING CENTER	1
PINE PRAIRIE ICE PROCESSING CENTER	1
RICHWOOD CORRECTIONAL CENTER	1
TACOMA ICE PROCESSING CENTER (NORTHWEST DET CTR)	106
WINN CORRECTIONAL CENTER	1
YUBA COUNTY JAIL	1
<b>Grand Total</b>	<b>135</b>

1 I declare under penalty of perjury under the laws of the United States and the State of  
2 Washington that the foregoing is true and correct.

3 DATED at Denver, Colorado this 15th day of January, 2020.

4 s/ Colin L. Barnacle  
5 Colin L. Barnacle  
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**PROOF OF SERVICE**

I hereby certify on the 15th day of January, 2020, pursuant to Federal Rule of Civil Procedure 5(b), I electronically filed and served the foregoing **DECLARATION OF COLIN L. BARNACLE IN SUPPORT OF DEFENDANT THE GEO GROUP, INC.'S OBJECTIONS TO PLAINTIFFS' PROPOSED AMENDED NOTICE PLAN** via the Court's CM/ECF system on the following:

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